

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: :

MARK P. KERRY

Debtor(s)

: Bankruptcy No. 17-14927REF

: Chapter 13

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HEARING TO BE HELD:

Date: January 25, 2018

Time: 9:00 a.m.

Place: United States

Bankruptcy Court

Courtroom #1, 3rd Floor

400 Washington Street

Reading, PA 19601

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TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

1. Your Movant is Frederick L. Reigle, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
2. The within case was commenced by the filing of a Chapter 13 petition on 7/21/17.
3. This Motion to Dismiss has been filed for the following reason(s):
 - The Debtor(s) has/have failed to commence or continue making timely payments to the Trustee as required by 11 U.S.C. Section 1326.
 - The plan does not appear to be feasible.
4. For the reasons set forth herein, the Trustee believes, and therefore avers, that the within case should be dismissed.

WHEREFORE, the Movant requests that the Court, after a hearing, enter an Order dismissing this case.

Respectfully submitted,

Date: January 10, 2018

/s/ Lisa M. Ciotti

Lisa M. Ciotti, Esq.
for
Frederick L. Reigle, Esq.
Standing Chapter 13 Trustee
2901 St. Lawrence Avenue
P. O. Box 4010
Reading, Pennsylvania 19606
Telephone: (610) 779-1313